

MAY 2 8 1997

Alan Kramer, Treasurer Wisconsin Right to Life Political Action Committee 10625 W North Avenue Milwaukee, WI 53226

Identification Number:

C00173278

Reference:

12 Day Pre-General Report (10/1/96-10/16/96)

Dear Mr. Kramer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the total(s) for Line 21(c), Columns A and B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

-The totals listed on Lines 17, 19 and 20, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor, the outstanding balance at the beginning and end of the reporting period, the amount incurred during the period, the payment made during the period, and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the full name and address of each creditor and purpose of each debt. 11 CFR §104.11

-Please amend your Schedule E to include memo entries to show the allocation of independent expenditures when the communication concerns more than one federal candidate. (see enclosure)

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future reports and correspondence using your correct identification number, C00173278, to avoid potential errors in entering your reports onto the public record.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil A. Evans

Reports Analyst

Reports Analysis Division

Unlike other operating expenditures, taxes on an SSF's earnings are not payable by the connected organization. AQ 1977–19.

Independent Expenditures

Schedule E

tremize any independent expenditure which, by itself or when edded to other independent expenditures made to the same payes during the same calendar year, exceeds \$200, independent expenditures are itemized on Schedule E. A subtotal for itemized independent expenditures is entered on Line (a).

Independent expenditures of \$200 or less do not need to be itemized, though the committee must report the subtotal of those expenditures on Line (b). 104.3(b)(3)(vii)(C) and 104.4(e).

Enter the lotal of itemized and unitemized independent expenditures on Line (c) of Schedule E and on Line 24 of the Detailed Summary Page.

Certification

The treasurer must sign the statement on Schedule E which certities, under penalty of perjury, that the expenditure meets the standards of "independence" (see Chepter 4 for more information). The form must be notarized. 104.3(b)(3)(vii)(B).

Last-Minute Independent Expenditure Notices

The SSF must file a special notice when it makes an independent exyd) 000,12 narti enom to enutibring itself or aggregated with other independent expenditures made to the same payea) after the 20th day but more. than 24 hours before the day of an election. The notice must be received by the filing office within 24 hours efter the expenditure is made (see "Federal Filling". on page 28). The notice must include all the information required on Schedule E. (This reporting requirement applies to a. written contract of more than \$1,000. which the committee has not yet paid.) 104.4(b) and 104.5(g).

INDEPENDENT EXPENDITURES

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Use memo entries to show the aflocation of an Independent expanditure when the communication concerns more than one tederal candidate.

The SSF must report the last-minute expanditure a second time on Schedule E, filed with its next regular report. 104.4(a).

8. Reporting Loans

Continuously itemize all loans received and made by the SSF until they are repaid. All repayments made or received on a loan must also be itemized.

104.3(a)(4)(iv); 104.3(b)(3)(iii) and (vi); 104.3(d); 104.11. Procedures for reporting loans and loan repayments are explained below.

Reminder: Loans are considered contributions to the extent of the cutstanding behance of the loan. 100.7(a)(1)(l). Loans from banks, however, are not considered contributions if made in the ordinary course of business. Endorsements and guarantees of bank toens, however, do count as contributions. 100.7(a)(1)(i) and (b)(11).

